

ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.
(Hennessey, Oklahoma)

DOCKET FILE COPY ORIGINAL

MB Docket No. 05-85
RM-11164

APR 25 2005
Federal Communications Commission
Office of Secretary

To: Office of the Secretary
Attn: Assistant Chief, Audio Division,
Media Bureau

COMMENTS

Oklahoma Radio Partners, LLC ("ORP"), by its counsel, and pursuant to Section 1.420 of the Commission's Rules, hereby submits its comments in the above-captioned proceeding. ORP requests that the Commission modify the reference point associated with the proposed allotment of Channel 249A in this proceeding. As demonstrated herein, the proposed modification is consistent with the Commission's allotment rules and is made with the petitioner's consent.

1. Exhibit E, Figure 1 is a channel spacing study, showing that Channel 249A can be allotted to Hennessey from the modified reference coordinates with clear spacing to all existing and proposed allotments. Figure 2 is a map demonstrating that from the proposed reference coordinates, the facilities will place a 70 dBu contour over the community of Hennessey.

2. Exhibit A is a statement from the petitioner in this proceeding, Charles Crawford, consenting to the proposed modification of the allotment reference coordinates. ORP did not pay or promise to pay any consideration whatsoever in exchange for the petitioner's consent.

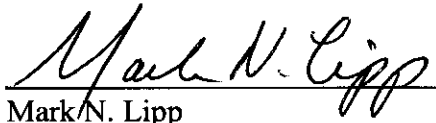
3. ORP intends to prepare a proposal for submission to the FCC which will offer protection to the Hennessey allotment if it is modified as proposed herein.

WHEREFORE, for the foregoing reasons, the Commission should adopt the Hennessey allotment with reference coordinates modified as proposed herein.

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Respectfully submitted,

OKLAHOMA RADIO PARTNERS, LLC

By: 
Mark N. Lipp
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Its Counsel

April 25, 2005

EXHIBIT A

**MB Docket No. 05-85
RM-11164
Channel 249A
Hennessey, Oklahoma**

I, Charles Crawford, petitioner in the above-captioned proceeding for a new allotment on Channel 249A at Hennessey, Oklahoma, hereby consent to a change in the reference coordinates of the proposed allotment to 36-07-55 North Latitude, 97-58-46 West Longitude. I will file an application for Channel 249A consistent with the Commission's spacing rules if the amendment to the FM Table of Allotments is approved.

This reference coordinate change is to accommodate a request of Oklahoma Radio Partners, which is preparing a separate proposal for submission to the FCC. To the extent Section 1.420(j) of the Commission's rules may be applicable, I hereby state that I have not been paid or promised any consideration in exchange for furnishing this statement. I understand that this statement may be used in a filing with the FCC and I hereby authorize its use for that purpose.

I verify that this statement is true and correct to the best of my knowledge and belief, and is made in good faith.



Charles Crawford

EXHIBIT E

ENGINEERING STATEMENT

In Support of

COMMENTS

MB Docket 05-85, RM-11164

Modify 249A Hennessey, OK - (ADD 249A)

REFERENCE

36 07 55 N

97 58 46 W

CLASS = A

Current Spacings

Channel 249 - 97.7 MHz

DISPLAY DATES

DATA 04-23-05

SEARCH 04-25-05

Call Channel Location Dist Azi FCC Margin

Community of Hennessey OK 7.76 109.3

Reference Coordinates:

North Latitude: 36-06-32

West Longitude: 97-53-53

RADD ADD 249A Hennessey OK 3.94 146.1 115.0 -111.06

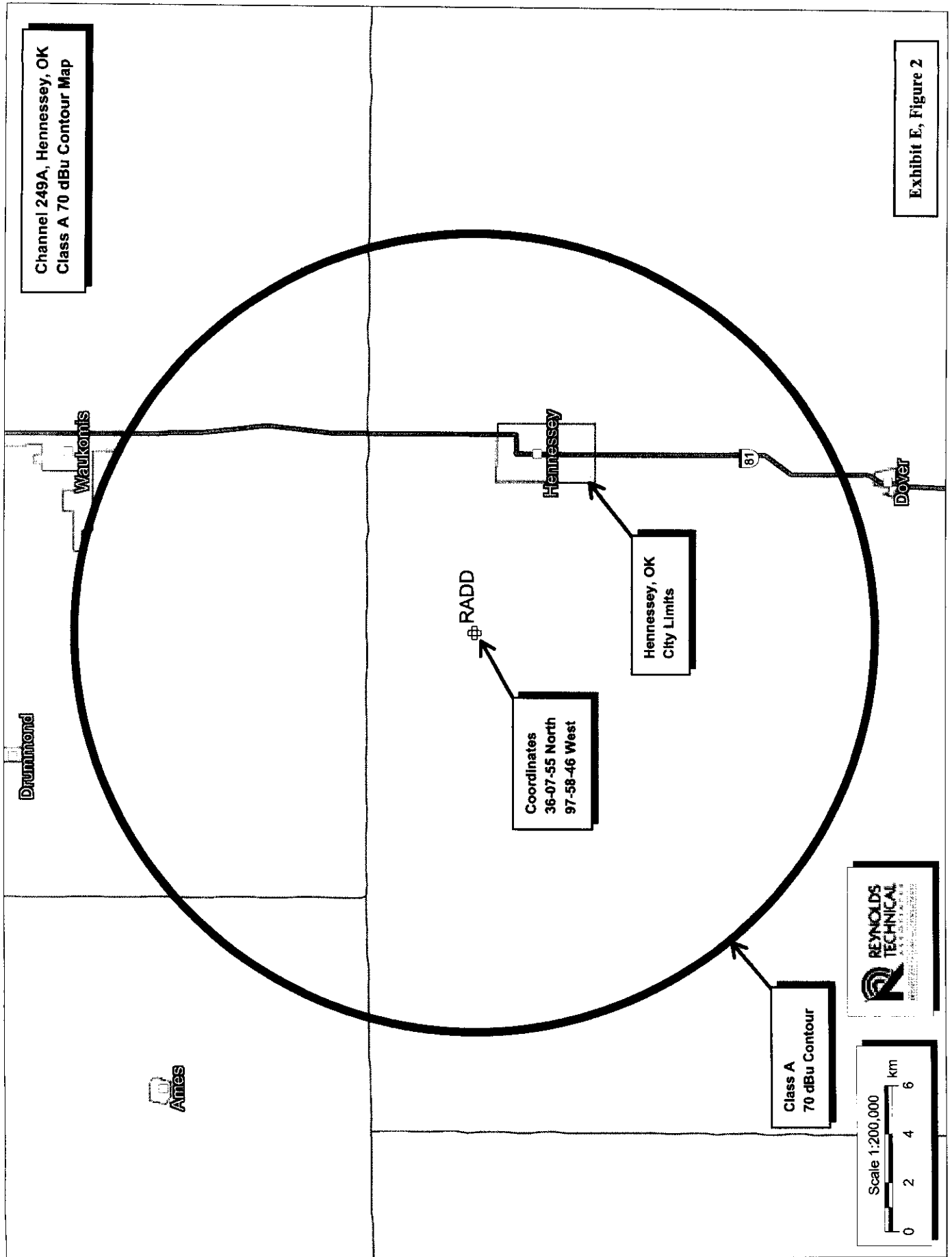
Of No Concern:

Proposed allotment reference before
instant counterproposal.

AL249	VAC	249A	Vici	OK	118.67	271.3	115.0	3.67
KKWD	LIC	250A	Edmond	OK	75.93	145.2	72.0	3.93
KMODFM	APP	248C	Tulsa	OK	169.44	87.0	165.0	4.44
RDEL	DEL	248C	Tulsa	OK	169.44	87.0	165.0	4.44
KMODFM	LIC	248C	Tulsa	OK	169.44	87.0	165.0	4.44
AP252	APP	252C1	Kiowa	KS	81.86	323.7	75.0	6.86
KPAK	LIC	248C2	Alva	OK	117.65	327.6	106.0	11.65
RADD	ADD	248C0	Tulsa	OK	169.44	87.0	152.0	17.44
KRBB	LIC	250C	Wichita	KS	187.36	12.7	165.0	22.36
AP252	APP	252C1	Kiowa	KS	107.58	335.8	75.0	32.58
AP252	APP	252C1	Kiowa	KS	108.16	335.4	75.0	33.16
VA252	VAC	252C1	Kiowa	KS	108.16	335.4	75.0	33.16
RDEL	DEL	252C1	Kiowa	KS	108.16	335.4	75.0	33.16
KRBB.C	CP	250C0	Wichita	KS	187.36	12.7	152.0	35.36
KVRO	LIC	251A	Stillwater	OK	74.09	82.2	31.0	43.09
KWEYFM	LIC	247C1	Weatherford	OK	118.98	230.3	75.0	43.98
RDEL	DEL	247C1	Weatherford	OK	118.98	230.3	75.0	43.98
R---		247A	Thomas	OK	78.64	235.9	31.0	47.64

Channel 249A, Hennessey, OK
Class A 70 dBu Contour Map

Exhibit E, Figure 2




CERTIFICATE OF SERVICE

I, Giselle Abreu, an executive secretary in the law firm of Vinson & Elkins, do hereby certify that on this 25th day of April, 2005, I caused copies of the foregoing "**Comments**" to be mailed, first class postage prepaid, or hand delivered, addressed to the following persons:

* Deborah A. Dupont
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Giselle Abreu